

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

REBECCA FRANCESCATTI,	)	
	)	
	)	
	)	
Plaintiff,	)	No. 1:11-cv-05270
	)	
v.	)	
	)	Honorable Blanche M. Manning
STEFANI JOANNE GERMANOTTA	)	Magistrate Judge Jeffrey T. Gilbert
p/k/a LADY GAGA, INTERSCOPE RECORDS,	)	
UNIVERSAL MUSIC GROUP, INC.,	)	ECF CASE
DJ WHITE SHADOW, LLC, and	)	
BRIAN JOSEPH GAYNOR,	)	JURY TRIAL DEMANDED
	)	
Defendants.	)	

**JOINT MOTION TO EXTEND DISCOVERY DEADLINES**

Plaintiff Rebecca Francescatti ("Plaintiff") and Defendants Stefani Joanne Germanotta p/k/a Lady Gaga, Interscope Records, Universal Music Group, Inc., DJ White Shadow, LLC, and Brian Joseph Gaynor ("Defendants" and, together with the Plaintiff, the "Parties"), by and through their undersigned counsel, hereby jointly move (the "Motion") this Court to extend the time for the parties to conduct fact discovery in the above-captioned case for 60 (sixty) days, up to and including November 5, 2012, and to extend the time for parties to complete liability expert discovery in the above-captioned case for 30 (thirty) days, up to and including November 21, 2012. In support of this motion, the Parties state as follows:

1. On March 6, 2012, this Court entered an order setting September 4, 2012 as the deadline for fact discovery in this case. (Docket Entry No. 63.) In addition, the March 6 order provided that liability expert discovery should be conducted as follows: (a) Plaintiff's liability expert reports would be served on or before July 23, 2012; (b) rebuttal liability expert reports

would be served on or before August 20, 2012; (c) Plaintiff's reply liability expert reports would be served on or before September 4, 2012; (d) Defendants' reply liability expert reports would be served on or before September 20, 2012; and (e) depositions of liability experts would be completed on or before October 22, 2012. (*Id.*)

2. Since the entry of that March 6, 2012 Order, the Parties have diligently pursued discovery, including negotiating a protective order, serving and responding to written discovery, and producing documents. In addition, the Parties have taken a number of depositions in this action.

3. The Parties are currently attempting to complete the remaining discovery in this action. Given the schedules of the counsel and witnesses involved, additional time is needed to complete certain of these depositions, including the deposition of the Plaintiff. The Parties have tentatively agreed to schedule the Plaintiff's deposition for October 4, 2012, subject to entry of an order by this Court extending the deadline for fact discovery to November 5, 2012.

4. In addition, Plaintiff has scheduled the deposition of non-party Nadir Khayat, who resides out of the country and therefore has been unavailable for deposition, for September 12, 2012 in Los Angeles, California, with agreement of Mr. Khayat's counsel.

5. The Parties have also agreed to an extension of certain liability expert discovery dates, including that: (a) Plaintiff's liability expert reports were served on August 10, 2012; (b) rebuttal liability expert reports will be served on or before September 7, 2012; (c) Plaintiff's reply liability expert reports will be served on or before September 22, 2012; (d) Defendants' reply liability expert reports will be served on or before October 9, 2012; and (e) depositions of liability experts will be completed on or before November 21, 2012.

6. This Motion for an extension of time is being made in good faith and not for the purpose of hindering or delaying these proceedings.

7. No Party will suffer prejudice if the Court grants this Motion.

8. In light of the circumstances described above, a 60 (sixty) day extension of time to complete fact discovery and a 30 (thirty)-day extension of time to complete liability expert discovery would serve the interests of justice.

WHEREFORE, Plaintiff and Defendants respectfully jointly request that this Court grant their motion to extend the discovery deadline in this case and extend its time for the parties to conduct fact discovery by 60 (sixty) days, up to and including November 5, 2012, and to extend the time for parties to complete liability expert discovery in the above-captioned case for 30 (thirty) days, up to and including November 21, 2012.

Dated: August 30, 2012

Respectfully submitted,

/s/Christopher W. Niro

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